Site Visit Report	MDSHA MS4 (General Permit No. 99-DP-3313) **Owings Mills Maintenance Facility & Security Satellite Facility** MDSHA District No. 4	Site Visit Date: 11/19/2013

Facility Name: Owings Mills Maintenance Facility
Location: 9130 Dolfield Road, Owings Mills, MD 21117

Date of Visit: November 19, 2013
Entry Time: 9:30 a.m. (approx)
Exit Time: 11:30 a.m. (approx)

Site Owner and/or Operator: Maryland State Highway Administration (MDSHA) – District 4

Site Contact: William Jones (Shop Chief, MDSHA)

Conducted by: Bobby Jacobsen (PG Environmental, LLC), Andy Dinsmore (U.S. EPA Region 3), Rebecca Crane (U.S. EPA Region 3), and Kaitlyn Bendik (U.S. EPA Region 3)

Accompanied by[1]: Dan Stigler (District Environmental Coordinator, MDSHA), David Lates (Assistant Resident Maintenance Engineer, MDSHA), and Amir Khurram (Resident Maintenance Engineer, MDSHA)

Site Visit Report Prepared by: Bobby Jacobsen (PG Environmental, LLC)

On November 19, 2013, the EPA Inspection Team conducted a site visit at the Owings Mills Maintenance Facility (hereinafter, Facility) located in Baltimore County, Maryland (refer to Photograph 1). Baltimore County is identified as a covered county in MDSHA's Municipal Separate Storm Sewer System (MS4) Discharge Permit (No. 99-DP-3313); therefore, the requirements of the MS4 permit are applicable to the Facility. The Facility also maintained permit coverage under the Maryland Department of Environment (MDE) General Discharge Permit for Stormwater Associated with Industrial Activities (Permit No. 02-SW).

The Facility is composed of multiple buildings (e.g., office building/vehicle maintenance building, salt storage dome, and material/equipment storage buildings), a vehicle fueling island, outdoor vehicle/equipment storage areas, vacuum truck dewatering area, and a vehicle wash bay. Various activities are conducted at or based out of the Facility, including the following: vehicle washing, storage, repair, and fueling; salt/sand/brine operations; snow removal operations; road maintenance operations; vegetation management; vacuum truck dewatering; and drainage maintenance operations.

The ground surface of the Facility is mostly impervious and there are multiple storm drain inlets and catch basins to collect and convey stormwater runoff at the Facility. Stormwater runoff is primarily conveyed to a permanent stormwater management basin in the southwestern portion of the Facility prior to discharge offsite (refer to Photograph 2). An unnamed tributary to Red Run is located approximately 300 feet southwest of the Facility. MDSHA staff explained that the stormwater management basin had been partially reconstructed and upgraded about three years prior to the EPA Inspection Team's site visit.

During the site visit, MDSHA's District Environmental Coordinator (hereinafter, DEC) for MDSHA District Nos. 4 and 5 explained MDSHA's oversight activities for pollution prevention and good

[1] Sign-in sheets for the site visit are provided after the photograph log.

housekeeping at the Facility. The EPA Inspection Team accompanied the DEC, Shop Chief, and additional MDSHA staff on an inspection of the Facility to identify any current site issues and discuss the items typically observed and documented by MDSHA during its oversight activities.

The EPA Inspection Team observed the following with regard to pollution prevention and good housekeeping at the Owings Mills Maintenance Facility:

1. A combined stormwater pollution prevention plan (SWPPP) and spill prevention control and countermeasure plan (SPCC) for the Facility, dated June 2011 (hereinafter, SWPPP/SPCC), was maintained onsite and made available to the EPA Inspection Team for review. The SWPPP/SPCC includes a site map of the Facility. The DEC explained that he updates the SWPPP/SPCC by hand at least one time per year to make sure it accurately reflects the Facility and onsite activities. For example, he explained that he updated the Facility site map to reflect the installation of a magnesium chloride storage tank within the past year. The SWPPP is required to be updated by a contract engineer every five years.
2. The DEC explained that two types of stormwater pollution prevention inspections are conducted at the Facility: weekly inspections conducted internally by Facility staff and quarterly inspections conducted by the DEC. MDSHA staff explained that the inspections are documented with inspection checklists. The DEC explained that he takes field notes while conducting inspections and photographs to document observed issues, and then completes an electronic version of the inspection checklist. The most recent quarterly inspection conducted by the DEC occurred on July 31, 2013. Weekly and quarterly inspection records were maintained onsite and made available for review at the time of the site visit.
3. The DEC explained that he conducts environmental compliance training, which includes a stormwater component, for MDSHA maintenance staff on an annual basis. He stated that the most recent training was conducted June 4–5, 2013, and training activities are tracked in an electronic "LMS" tracking database.
4. The Facility has an indoor vehicle wash bay which is connected to an oil/water separator and discharges to the sanitary sewer. MDSHA staff explained that the oil/water separator is inspected quarterly, and cleaned as needed, by Maryland Environmental Services (MES). MES provides the Facility with a formal report of each inspection/cleaning event.
5. The Facility has a structure for dewatering vacuum truck waste material in the northeastern portion of the Facility (refer to Photographs 3 and 4). MDSHA staff explained that the dewatering structure is connected to an oil/water separator and discharges to the sanitary sewer (refer to Photograph 5). The dewatering structure and oil/water separator are inspected quarterly and cleaned as needed by MES. The Shop Chief stated the oil/water separator has been in use at the Facility for about three or four years.
6. A solid waste dumpster located near the southeast corner of a building along the eastern edge of the Facility (Area No. 25 on the Facility site map) was not fully covered at the time of the site visit and staining was present on the adjacent impervious ground surface (refer to Photographs 6 and 7). The Facility site map depicts that stormwater runoff from this area would flow to a storm drain inlet located approximately 175 feet to the west of the dumpster. Table 6 of the Facility SWPPP/SPCC

identifies that the dumpster should be covered and contact with stormwater could lead to leaching of contents.

7. A hose bib was present outside of the "Team Leaders Building / Vehicle Storage Building" (Area No. 16 on the Facility site map) without labeling indicating its purpose or restrictions on use (e.g., no vehicle washing; refer to Photograph 8). Facility staff explained the hose bib is typically used for filling large water tanks on the back of trucks. In addition, two 55-gallon drums used as solid waste disposal receptacles were present along the building but were not labeled to identify them as such (refer to Photographs 9 and 10).
8. Salt and white salt residue was present on and beyond the perimeter control best management practice (BMP) located at the entrance to the salt storage dome in the northwestern portion of the Facility (refer to Photographs 11 through 13). The DEC explained that the BMP was a piece of foam material covered with filter fabric. This BMP is described in Table 6 of the Facility SWPPP/SPCC. The Facility site map depicts that stormwater runoff from this area would flow to a storm drain inlet located approximately 200 feet to the east of the salt storage dome.
9. The magnesium chloride storage tank and salt brine storage tanks located in the north-central portion of the Facility (Area No. 13 on the Facility site map) were not located within secondary containment (refer to Photographs 14 and 15). The Facility site map identifies that a storm drain inlet is located approximately 100 feet to the east of the storage tanks.
10. Salt residue was present on the impervious ground surface adjacent to the salt brine maker in the north-central portion of the Facility (Area No. 13 on the Facility site map; refer to Photographs 15, 16, and 17).
11. Staining was present on the impervious ground surface in a vehicle parking area directly to the southwest of an equipment storage building at the Facility (Area No. 17 on the Facility site map; refer to Photograph 18). In addition, an absorbent rag with petroleum product was present in this area (refer to Photograph 19). The Shop Chief explained that this is the type of issue he would note during his weekly inspection of the Facility and address with his staff. The Facility site map depicts that stormwater runoff from this area would flow toward a storm drain inlet approximately 150 to the east of the parking area.
12. Accumulated sediment was present adjacent to a storm drain inlet in the vehicle storage area in the central area of the Facility (Area No. 24 on the Facility site map; refer to Photograph 20). According to the Facility site map, stormwater runoff that enters this storm drain inlet is conveyed to the permanent stormwater management basin in the southwestern corner of the Facility.

Immediately following the Owings Mills Maintenance Facility site visit, the EPA Inspection Team conducted a site visit at the Security Satellite Facility (hereinafter, Satellite Facility). MDSHA staff explained that the Satellite Facility is operated and maintained by MDSHA Owings Mills Maintenance Facility personnel. The Satellite Facility is located at 1709 Belmont Avenue, Baltimore, MD, 21244. The Satellite Facility is typically not staffed and is comprised of an office building, a fuel tank and dispenser, a magnesium chloride storage tank, and a salt storage barn.

The EPA Inspection Team observed the following with regard to pollution prevention and good housekeeping at the Security Satellite Facility:

13. A combined SWPPP/SPCC for the Satellite Facility, dated July 2010 (hereinafter, SWPPP/SPCC), was maintained onsite and made available to the EPA Inspection Team for review.
14. MDSHA staff explained that the Shop Chief conducts inspections of the Satellite Facility monthly and the DEC conducts inspections semi-annually.
15. The magnesium chloride storage tank located in the southwestern portion of the Satellite Facility was not located within secondary containment (refer to Photographs 21 and 22). The Resident Maintenance Engineer stated that MDSHA was evaluating how to achieve secondary containment for these types of tanks statewide.
16. An indicator on the double-walled diesel fuel tank indicated fluid between the two tank walls (refer to Photographs 23 and 24). The DEC explained that this tank has had issues with condensation between the tank walls but would contact the proper contractor to pump out any accumulated fluid. He added that this tank is scheduled for an upgrade in spring 2014. A spill kit was located adjacent to the diesel fuel tank (refer to Photograph 23).
17. Staining was present underneath a front loader stored at the Satellite Facility (refer to Photographs 25 through 28). MDSHA staff explained that the equipment is the property of a private contractor, White Pine Paving, who conducts salt loading operations for MDSHA. Table 6, Summary of Oil Storage and Secondary Containment and Potential Pollutant Sources and Existing Management Practices, of the Satellite Facility SWPPP/SPCC did not indicate that drip pans should be used under heavy equipment or vehicles stored onsite.

Site Photographs	MDSHA MS4 (General Permit No. 99-DP-3313) **Owings Mills Maintenance Facility & Security Satellite Facility** MDSHA District No. 4	Site Visit Date: 11/19/2013

Owings Mills Maintenance Facility Photographs

Photograph 1. Overview photograph of Owings Mills Maintenance Facility. View of vehicle maintenance shop bays.

Photograph 2. View of permanent stormwater management basin in the southwestern portion of the Facility. Stormwater leaving the basin is discharged offsite.

Photograph 3. View of the vacuum truck waste material dewatering structure located in the northeastern portion of the Facility.

Photograph 4. Close-up view of vacuum truck waste material in the dewatering structure.

Photograph 5. View of the oil/water separator which treats the dewatering structure effluent and discharges to the sanitary sewer.

Photograph 6. View of the waste dumpster located near the southeast corner of a building along the eastern edge of the Facility. Note that the dumpster was not fully covered at the time of the site visit and that staining was present on the adjacent impervious ground surface.

Photograph 7. Alternate view of staining on the impervious ground surface adjacent to the waste dumpster.

Photograph 8. View of a hose bib located outside of the "Team Leaders Building / Vehicle Storage Building." Note that the hose was not labeled in order to indicate its purpose or usage restrictions.

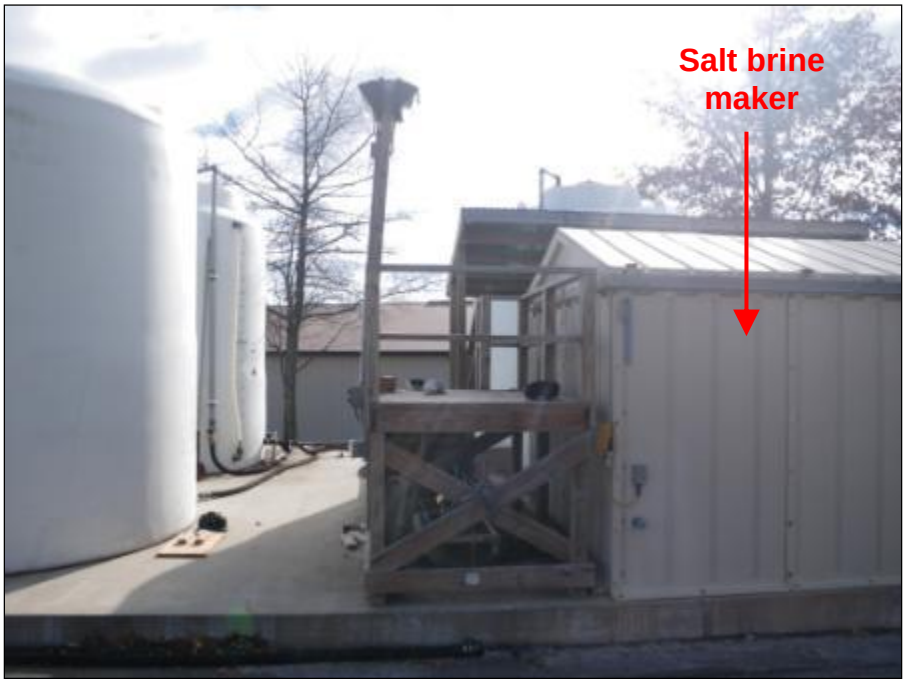
Photograph 9. View of one of two 55-gallon drums used for solid waste disposal, located along the outside of the "Team Leaders Building / Vehicle Storage Building." Note that the drum was not labeled to identify the contents.

Photograph 10. View of the additional 55-gallon drums used for solid waste disposal, located along the outside of the "Team Leaders Building / Vehicle Storage Building." Note that the drum was not labeled to identify the contents.

Photograph 11. View of the salt storage dome in the northwestern portion of the Facility. Note that salt was observed beyond the perimeter control BMP located at the entrance.

Photograph 12. Close-up view of salt and white salt residue beyond the perimeter control BMP located at the salt storage dome entrance.

Photograph 13. Alternate view of salt and white salt residue beyond the perimeter control BMP located at the salt storage dome entrance.



Photograph 14. View of the magnesium chloride and salt brine storage area and tanks located in the north-central portion of the Facility. Note lack of secondary containment.

Photograph 15. Alternate view of the magnesium chloride and salt brine storage area and tanks located in the north-central portion of the Facility. Note lack of secondary containment. Also note white salt residue in the curbline adjacent to the salt brine maker.

Photograph 16. Close-up view of white salt residue in the curbline adjacent to the salt brine maker shown in previous photograph.

Photograph 17. View of white salt residue on impervious ground surface downgradient of the salt brine maker.

Photograph 18. View of staining on the impervious ground surface in a vehicle parking area directly to the southwest of an equipment storage building at the Facility.

Photograph 19. Close-up view of staining and a petroleum-soaked absorbent rag in area shown in previous photograph.

Photograph 20. View of accumulated sediment adjacent to a storm drain inlet in the vehicle storage area in the central area of the Facility.

Security Satellite Facility Photographs

Photograph 21. View of magnesium chloride storage tank located in the southwestern portion of the Satellite Facility. Note that the storage tank did not have secondary containment.

Photograph 22. Close-up view of the magnesium chloride storage tank area. Note lack of secondary containment.

Photograph 23. View of the double-walled diesel fuel tank. Note that an indicator on the unit signaled that there was fluid between the two tank walls at the time of the inspection.

Photograph 24. Close-up view of the indicator on the double-walled diesel fuel tank.

Photograph 25. View of front loader stored at the Satellite Facility. Note staining underneath the front loader.

Photograph 26. Close-up view of staining underneath front loader stored at the Satellite Facility.

Photograph 27. Additional close-up view of staining under front loader stored at the Satellite Facility.

Photograph 28. View of the side of the front loader. Note that the equipment is the property of a private contractor, White Pine Paving.

Sign-in Sheet	MDSHA MS4 (General Permit No. 99-DP-3313) **Owings Mills Maintenance Facility & Security Satellite Facility** MDSHA District No. 4	Site Visit Date: 11/19/2013

INSPECTION SIGN-IN SHEET (PLEASE PRINT)

Name of Facility: OWINGS MILLS MAINT SHOP **Date Conducted:** 11/19/13

Name	Title	Entity	Phone
BOBBY JACOBSEN	EPA CONTRACTOR	PG ENVIRONMENTAL	363 279 1778
DAN STIGLER	SHA ECD	DISTRICT ENVIRONMENTAL COORD.	410 585-5563
William Jones	~~SHA~~ Owings Mills	Shop Chief	410-363-1315
ANDY DINSMORE	NPDES ENFORCEMENT STORMWATER TEAM LEADER	US EPA	215-814-2788
Rebecca Crane	US EPA NPDES Enforcement Officer	US EPA	215-814-2389
David Yates	ARME SHA Om	ARME	443-829-5243
Kaitlyn Bendik	NPDES Permits Compliance Officer	US EPA Region 3	215-814-2709

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